## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

TARA LYNN HALL, :

Debtor : CASE NO. 1:19-bk-04391

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:

### MOTION TO SUSPEND PLAN PAYMENTS

COMES NOW the Debtor, by and through Dorothy L. Mott, and requests the modification of the payment schedule under the Chapter 13 Plan, respectfully stating in support thereof as follows:

- 1. The Debtor filed a Chapter 13 Bankruptcy Petition on October 9, 2019.
- 2. The Plan provides for monthly payments to the Trustee.
- 3. The Debtor has lost her job and will not be able to make the next several Trustee payments.
- 4. The Debtor requests that the payments required to be made under the Plan be reduced to \$0.00 for three (3) months.
  - 5. The Debtor will pay the missed payments in a lump sum if they are not paid earlier.
  - 6. The Chapter 13 Trustee, Charles J. DeHart, III, concurs in this motion.

WHEREFORE, the Debtor respectfully requests that this Court enter an order reducing the payments under the Plan to \$0.00 for a period of three (3) months and permitting the remainder to be made in a lump sum at the end of the Chapter 13 Plan.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott Pa. Id. 43568 125 State Street Harrisburg, PA 17101 (717) 232–6650 TEL (717) 232-0477 FAX doriemott@aol.com

# UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

TARA LYNN HALL, CASE NO. 1:19-bk-04391

Debtor

:

ORDER

UPON CONSIDERATION of the Motion to Suspend Trustee Payments;

It is hereby ORDERED AND DECREED that the Debtor's payments are reduced to \$0 for a period of three months and that the Debtor is hereby permitted to pay the remainder of the payments for said period in a lump sum at the end of the Chapter 13 Plan.

# UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Chapter:13

Tara Lynn Hall

Debtor Case number:1:19-bk-04391

Matter: Motion to Suspend Plan Payments

Tara Lynn Hall

Movant

vs,

Respondents(s)

## **NOTICE**

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection or other matter without further notice or hearing unless a party in interest files an objection/response within twenty-one (21) days of the date of the notice. If you object to the relief requested, you must file your objection/response with the Clerk, U. S. Bankruptcy Court, 228 Walnut Street, Third Floor, PO Box 908, Harrisburg PA 17108-0908 and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

Date: April 27, 2021

Dorothy L. Mott, Esquire Attorney ID #43568 Dorothy L Mott Law Office, LLC 125 State Street Harrisburg PA 17101 (717)232-6650 TEL (717)232-0477 FAX doriemott@aol.com

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: **CHAPTER 13** 

CASE NO. 1:19-bk-04391 TARA LYNN HALL,

**Debtor** 

### CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on April 27, 2021 I served a copy of the Motion to Suspend Payments on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART III ESQUIRE 8125 ADAMS DRIVE, SUITE A HUMMELSTOWN PA 17036	Electronically

I certify under penalty of perjury that the foregoing is true and correct.

Name: /s/ Dorothy L. Mott

Printed Name of Attorney: Dorothy L. Mott Address: 125 State Street, Harrisburg PA 17101